

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN RE:**

**ALEXIS RAMIREZ ROSADO**

**DEBTOR(S)**

**ALEXIS RAMIREZ ROSADO**

**Vs.**

**BANCO POPULAR OF PUERTO RICO**

**And**

**JOSE R. CARRION RIVERA**  
**Trustee**

**Respondents**

**CASE NO: 22-01853-MCF**

**CHAPTER: 13**

**ANSWER TO MOTION REQUESTING THE LIFT OF STAY**

**TO THE HONORABLE COURT:**

**COMES NOW**, DEBTOR, through the undersigned attorney and respectfully, STATES, ALLEGES and PRAYS:

1. The Debtors filed the present bankruptcy petition on June 29, 2022.
2. On July 26, 2022, secured creditor **BANCO POPULAR OF PUERTO RICO** filed a motion for relief of stay alleging that the Debtor has failed to keep current on the Debtors' direct post-petition mortgage loan payments with such secured creditor.
3. On July 27, 2022, the undersigned talk by the phone with the Debtor to inform her terms and procedures of a motion for relief from stay.
4. The undersigned needs until the initial hearing set for August 16, 2022 to allow the Debtor to gather the evidence of the payments and to discuss with the creditor the payments that will be paid by the Debtor to cure the post-petition mortgage loan arrears.

MOTION REQUESTING  
THE LIFT OF STAY

**WHEREFORE,** Debtor respectfully requests this Honorable Court to deny Banco Popular of Puerto Rico the motion for relief of stay.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY:** that on this same date, I electronically filed the above document with the Clerk of the Court using the CM/ECF Filing System which sends notification of such filing to all those who is this case have registered for received for of notice by electronic mail. I further certify that the foregoing has been served to U.S. Trustee at [ustpreion21.hrecf@usdoj.gov](mailto:ustpreion21.hrecf@usdoj.gov) and by depositing true and correct copies thereof in the United States Mail, postage prepaid, to the non ECF/CM participants: Debtor(s) and parties in interest that have filed notices of appearance, included in the service list attached to the original hereof.

**RESPECTFULLY SUBMITTED,**

In San Juan, Puerto Rico this 27<sup>th</sup> day of July 2022.

/S/Victor C. Thomas Santiago  
USDC PR 209807  
Attorney for Debtor  
127 De Diego Avenue  
Cond. Vallecillos Apt. 1-A  
San Juan, Puerto Rico 00911  
Tel. (787) 722-5601  
Fax (787) 724-6366  
E-mail: [vthomas@thomasmag.com](mailto:vthomas@thomasmag.com)

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0104-3  
Case 22-01853-MCF13  
District of Puerto Rico  
Old San Juan  
Wed Jul 27 15:23:25 AST 2022

BANCO POPULAR DE PUERTO RICO  
MORTGAGE COUNSELING AND BANKRUPTCY (762)  
PO BOX 362708  
SAN JUAN, PR 00936-2708

US Bankruptcy Court District of P.R.  
Jose V Toledo Fed Bldg & US Courthouse  
300 Recinto Sur Street, Room 109  
San Juan, PR 00901-1964

BANCO POPULAR DE PR  
GPO BOX 2708  
San Juan, PR 00936

DEPARTAMENTO DE HACIENDA DE PR  
BANKRUPTCY DEPARTMENT  
PO BOX 9024140  
SAN JUAN, PR 00902-4140

DEPARTMENT OF TREASURY  
BANKRUPTCY SECTION 424B  
PO BOX 9024140  
SAN JUAN, PR 00902-4140

PR TELEPHONE CO  
PO BOX 70367  
SAN JUAN, PR 00936-8367

ALEXIS RAMIREZ ROSADO  
CALLE 13 BLOQ 28 #17  
URB SANTA ROSA  
BAYAMON, PR 00959-6562

JOSE RAMON CARRION MORALES  
PO BOX 9023884  
SAN JUAN, PR 00902-3884

MONSITA LECAROS ARRIBAS  
OFFICE OF THE US TRUSTEE (UST)  
OCHOA BUILDING  
500 TANCA STREET SUITE 301  
SAN JUAN, PR 00901

VICTOR THOMAS SANTIAGO  
127 DE DIEGO AVE APT 1-A  
SAN JUAN, PR 00911-1909

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